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12  
13 **UNITED STATES DISTRICT COURT**  
14 **DISTRICT OF NEVADA**

15 B DIAMOND INFRA LLC,

16 Plaintiff,

17 v.

18 CARMEN FERCH, AS TRUSTEE OF  
19 THE CARMEN FERCH TRUST, and the  
20 FEDERAL AVIATION  
21 ADMINISTRATION,

22 Defendants.

23 Case No. 3:22-cv-00443-LRH-CSD

24 **Stipulation to Extend the United States'**  
25 **Deadline to Answer**

26 **(Second Request)**

27 Pursuant to Local Rule IA 6-1, the parties stipulate and request that Defendants  
28 shall have a 30-day extension of time to file an answer or otherwise respond to Plaintiff's  
Complaint (ECF No. 1). This is the Parties' second request for extension.

29 The parties have worked diligently to verify important facts, discuss this matter with  
30 interested parties, and determine whether they can resolve this matter without litigation.  
31 They have circulated a draft stipulation that will resolve this matter which is being  
32 considered by the various parties. The parties agree that a 30-day extension of the answer  
33 deadline is appropriate under the circumstances. This stipulation is filed in good faith and  
34 not for the purpose of delay.

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1 WHEREFORE, the parties respectfully requests that this stipulation be granted and  
2 that the deadline to respond to the complaint be extended through and including **March**  
3 **10, 2023.**

4 Respectfully submitted this 8th day of February 2023.

5 HOLLAND & HART LLP

JASON M. FRIERSON  
6 United States Attorney

7 /s/ Timothy Lukas  
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16 *Attorney for Defendant Carmen Ferch as  
Trustee of the Carmen Ferch Trust*

17 IT IS SO ORDERED:

18   
19 UNITED STATES MAGISTRATE JUDGE  
20 DATED: February 9, 2023